



Sussex
Wildlife Trust

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By email only

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Dear Sir/Madam

The following objections are made on behalf of the Sussex Wildlife Trust in relation to the A27 consultation - Arundel Bypass.

1. Consultation Process

1.1 In 2003, the then Secretary of State did not support the Arundel Bypass proposal due to the significant environmental impacts. The Sussex Wildlife Trust asks why almost identical proposals are back on the table. **What has changed?**

1.2 Having viewed the available information on the 2017 consultation webpage, the Sussex Wildlife Trust does not believe that the process has considered all options available to improve access around Arundel and the wider A27 network.

The Sussex Wildlife Trust calls for a holistic approach to the issue of access. We ask Highways England (HE) to provide clear information of how the **Sustainable Transport Hierarchy**, introduced by the Sustainable Development Commission and adopted by the Department for Transport (DfT), has been worked through. HE must operate within Government Policy and therefore must ensure that all reasonable options to minimise demand, widen travel choices and improve efficiency have been considered before moving to the final option of increasing capacity through the provision of new infrastructure schemes.

The A27 corridor feasibility study: stage 1 evidence report states that *'Following the 2013 Spending Review, the Government announced its plans for the biggest ever upgrade of the strategic national roads network...'* this includes the A27 Corridor. Therefore, the scheme is fundamentally flawed from the outset, as the driver is to upgrade the trunk road network, not to address or find optimum solutions to the wider access problems in the A27 Corridor as per the Transport Hierarchy.

1.3 In 2002, the South Coast Multi Modal Study (SoCoMMS) was published and formed a part of the DfT's programme of Multi Modal studies. The SoCoMMS recommendations included enhancements to the Strategic Road Network to tackle congestion, alongside **measures to improve access to public transport and transport hubs, and to manage predicted growth in travel demand alongside balanced choices for transport users.** SoCoMMS outputs provided a framework for considering future transport investment decisions in the study area.

Improvements to public transport have not been adequately addressed in this process. The A27 corridor feasibility study: stage 1 evidence report states in section 1.4.3 that the *'the rail network is*

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close to capacity with no significant improvements planned. It then goes on to say *'consultation with the various Local Authorities along the corridor indicates that no major road-based public transport investment is anticipated'*. The Sussex Wildlife Trust asks why this is when the 2002 study clearly makes recommendations for improvements to these areas.

- 1.4 The steps needed, in terms of public services and public transport, to make a fundamental change to how growth is planned in the West Sussex A27 Corridor are repeatedly missed. This means public transport improvements will not be prioritised, or even considered, as part of a solution to congestion. Given the Government's **commitment in the 2008 Climate Change Act** and to pursuing sustainable development, this lack of strategic cross-departmental planning is not acceptable.

2. Access to information

- 2.1 We raise concerns about the **availability of information** during the consultation process. For considerable periods, over the consultation period it has been impossible to access information on the consultation website, in particular the Environmental Study Report. The Sussex Wildlife Trust had to lodge a number of requests for this document as it disappeared from the consultation webpage on multiple occasions. Having requested the document via email on the 10th September we did not receive a response or the documentation until 26th September. This is not an acceptable way in which to run a public consultation of this significance.

3. Justification for the proposal of a Bypass

- 3.1 The public consultation brochure states that there are six high-level objectives which the Arundel Bypass scheme aims to meet. **The Sussex Wildlife Trust cannot see that any of the options being consulted on meet these objectives.** The Technical Appraisal Report (TAR) states that it assesses the options that have been developed in order to meet the scheme objectives, but does not relate this back to the objectives. In particular, it is not clear to us how these proposals can *'minimise environmental impact'* or *'enhance the quality of the surrounding habitat'*, as per objective 5.

All of the options involve significant loss of ancient woodland, an irreplaceable habitat, and therefore cannot be said to carry out the consultation objective to *'work in harmony with the environment to conserve natural resources and encourage biodiversity'*.

- 3.2 Paragraph 118 of the National Planning Policy Framework states that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, unless the **need for, and benefits of the development in that location clearly outweigh the loss.**

Highways England has failed to demonstrate that any of the three options put forward are needed or that they will produce the benefits claimed in the consultation document. Evidence has demonstrated time and time again, that road building induces traffic, rather than reducing it. In particular we direct you to the conclusion of CPRE's 2017 report – The end of the road? Challenging the road-building consensus, this states:

From examining road-building over the past 20 years, the researchers found clear evidence that road schemes:

- *induce traffic, often far above background trends over the longer term*
- *lead to permanent and significant environmental and landscape damage*
- *show little evidence of economic benefit to local economies*

The Environmental Study Report easily demonstrates in chapter 8; table 8.4 that all the options proposed will result in losses to ancient woodland. The loss of irreplaceable habitat for a maximum time saving of 8 minutes (options 3 & 5A) is not acceptable, particularly when other options to reduce congestion through the implementation of the Transport Hierarchy have not been considered. Without investment in the Transport Hierarchy or genuine examination of the environmental impacts of the proposals this statistic of an 8 minute time saving is meaningless, merely a sound-bite.

4. Evidence Base

- 4.1 Having viewed the Environmental Study Report (ESR) and Preliminary Ecological Appraisal (PEA), it is clear that the information provided at this stage is **too limited to adequately understand the full ecological impact of the proposed options**. That said, what information is available through the desk based evidence and limited field surveys, already demonstrates that the impacts to biodiversity from all options are extreme and cannot be justified.
- 4.2 The ecological assessments undertaken by HE are **not appropriate** for a proposal of this scale. For example the desktop data is from 2005 – 2015 and therefore does not utilise the most recently available data. The Phase 1 Habitat Survey was carried out at a sub optimal time, three days in January 2016, and covers only 20% of the survey area. We also note that the target notes for the survey, found in appendix D, do not appear to match the survey, they reference Kings Lynn and there are only 5 notes. **The full target notes must be made available**.

The PEA described the Extended Phase 1 Survey in section 3.3.8 as providing a '*general assessment of potential nature conservation value*.' Given the concerns we have about the quality of the information presented, this statement is rather generous.

- 4.3 It is unacceptable that there is an **absence of targeted species surveys**. The PEA states in section 4.2.38 that the '*Survey Area has the potential to support various protected and notable species*', however that '*no targeted species surveys have been undertaken*'. There are numerous points in the PEA and ESR where further surveys for a wide range of protected species are suggested, however they have not been presented with this consultation. This is despite there being a full 18 months between the Phase 1 Habitat Survey being carried out and the publication of this consultation.

We note that the Technical Appraisal Report states '*In the absence of detailed protected and notable species survey data, it is not possible to accurately determine the impacts resulting from each of the Scheme Options. Further survey and assessment will be undertaken at PCF stages 2 and 3 in order to accurately determine the impacts and magnitude of impacts for protected and notable species*'.

This approach of leaving the protected species surveys until the preferred route is selected will not enable a fair analysis of the most suitable or sustainable option. The true impact on the environment of each possible option, including employing other methods to improve access, must be established at this consultation stage to enable a fair comparison.

5. Mitigation principles

- 5.1 The mitigation hierarchy is clear that **all efforts to avoid negative impacts must be exhausted before mitigation and then compensation is proposed**. The lack of detailed environmental information at this stage means that options to avoid impacts cannot be properly considered. It is not acceptable to leave this until a preferred route is chosen as appropriate avoidance may include selecting a different route or method of reducing congestion. It is also not acceptable to make mitigation recommendations as in sections 1.1.4 and 1.1.5 of the PEA based on such a poor level of information.
- 5.2 The TAR states: '*where loss of ancient woodland is unavoidable it may be possible to partially compensate for the loss of ancient woodland through a combination of techniques including soil and vegetation translocation, new woodland planting and enhancement and restoration of existing woodland areas*'. The destruction of ancient woodland cannot be mitigated or fully compensated for and there is no evidence that stable climax communities, such as ancient woodland, can be recreated through habitat translocation. **This will clearly result in a loss to biodiversity and should be stated as such**.

5.3 The lack of detailed environmental information presented in this consultation results in the costs and extent of mitigation being impossible to calculate. Not only is the habitat impacted by these proposals not accurately reported on, but **the value of the impacted landscape in providing ecological connectivity** is not discussed.

This is unacceptable given that the National Planning Policy Framework is clear that pursuing sustainable development involves **moving from a net loss of biodiversity to achieving net gains for nature**. In addition, the Government expects HE to support the objectives of Biodiversity 2020 as stated in Highways England's Biodiversity Plan.

6. Summary

6.1 In summary, this consultation is not acceptable due to the following:

- There has been no consideration of the Transport Hierarchy
- The ecological information provided is not appropriate or sufficient for a proposal of this impact
- The suggested benefits of the options do not justify the severe environmental damage

Therefore, the Sussex Wildlife Trust:

- **Objects** outright to options 3 and 5A
- **Objects** to option 1 in its current form

7. Recommendations

7.1 The Sussex Wildlife Trust sees that the only viable way forward is to undertake a new consultation that uses the Transport Hierarchy to identify the appropriate solutions to access and associated congestion for the wider A27 corridor. This approach would ensure that concerns are properly addressed and the environment impacts are valued appropriately.

7.2 We recommend that any future consultation involves considered and detailed assessment relating to the impacts on biodiversity, so that a robust and professional decision about the acceptability of proposals can be made.

7.3 We suggest that a consultation of this scale takes a progressive approach when assessing its impact on the natural environment and produces a Natural Capital Assessment. The latest report from the Natural Capital Committee in January 2017 makes a clear recommendation that the National Infrastructure Commission should incorporate natural capital, including its maintenance, restoration and recovery, into long term infrastructure plans. It also makes a direct recommendation that Local Authorities and major infrastructure providers should ensure that natural capital is protected and improved, consistent with the overall objective of the emerging Defra 25 Year Environment Plan.

7.4 Any future consultations should reinforce existing environmental duties of public bodies, including those enshrined under Section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the purpose of conserving biodiversity, including restoring or enhancing species populations and habitats.

The Sussex Wildlife Trust would be happy to discuss any of the points raised within our consultation response.

Yours sincerely,

Laura Brook
Conservation Officer